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18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,
28 AS TRUSTEE FOR GREENPOINT
29 MORTGAGE FUNDING TRUST
30 MORTGAGE PASSTHROUGH
31 CERTIFICATES, SERIES 2006-AR6,

32 Plaintiff,

33 vs.

34 FIDELITY NATIONAL TITLE GROUP,
35 INC., et al.,

36 Defendants.

Case No.: 2:21-cv-00273-JAD-NJK

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND AND
MOTION FOR FEES AND COSTS
[ECF No. 14]**

(Second Request)

[ECF No. 26]



Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank National Association (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 18, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-829687-C [ECF No. 1-1];
2. On February 18, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On March 22, 2021, U.S. Bank filed a Motion for Remand and Motion for Costs and Fees [ECF No. 14];
4. Chicago Title’s original deadline to respond to U.S. Bank’s Motion for Remand and Motion for Costs and Fees was April 5, 2021;
5. The Court previously granted Chicago Title’s request to extend the deadline to respond to U.S. Bank’s Motion for Remand and Motion for Fees and Costs to April 26, 2021 [ECF No. 21];
6. Chicago Title’s counsel is requesting an additional extension until May 19, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
7. Chicago Title requests another extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in U.S. Bank’s motions;
8. U.S. Bank does not oppose the requested extension;
9. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand and Motion for Costs and Fees [ECF No. 14] is hereby extended through and
3 including May 19, 2021.

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5 Dated: April 23, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: April 23, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

14 Dated: April 23, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff U.S. BANK
NATIONAL ASSOCIATION

18 **IT IS SO ORDERED:**

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20 Dated: April 26, 2021

21 By: 
22 UNITED STATES DISTRICT COURT JUDGE
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